

EXHIBIT 48

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION
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4
5 TAYLOR SMART AND MICHAEL)
6 HACKER, individually and on)
7 behalf of all those similarly)
8 situated,)
9 Plaintiffs,)
10) Case No.
11 vs.) 22-cv-02125-WBS-CSK
12)
13 NATIONAL COLLEGIATE ATHLETIC)
14 ASSOCIATION, an unincorporated)
15 association,)
16)
17 Defendant.)
18)
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23)
24)
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PORTIONS OF THE TRANSCRIPT HAVE BEEN
DESIGNATED AS CONFIDENTIAL

VIDEOTAPED DEPOSITION OF KHALA TAYLOR
Newark, California
Wednesday, October 23, 2024
Volume I

Reported by:
CATHERINE A. NOLASCO, RMR, CRR, BS
CSR No. 8239
Job No. 6932441
PAGES 1 - 319

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION
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4 TAYLOR SMART AND MICHAEL)
5 HACKER, individually and on)
6 behalf of all those similarly)
7 situated,)
8 Plaintiffs,)
9) Case No.
10 vs.) 22-cv-02125-WBS-CSK
11)
12 NATIONAL COLLEGIATE ATHLETIC)
13 ASSOCIATION, an unincorporated)
14 association,)
15 Defendant.)
16)
17 JOSEPH COLON, SHANNON RAY,)
18 KHALA TAYLOR, PETER ROBINSON,)
19 and KATHERINE SEBBANE,)
20 individually and on behalf of)
21 all those similarly situated,)
22 Plaintiffs,)
23) Case No.
24 vs.) 23-cv-00425-WBS-CSK
25)
26 NATIONAL COLLEGIATE ATHLETIC)
27 ASSOCIATION, an unincorporated)
28 association,)
29 Defendant.)
30)
31 Videotaped deposition of KHALA TAYLOR,
32 Volume I, taken on behalf of Defendant, with the
33 Witness appearing at Doubletree, 39900 Balentine
34 Drive, Newark, California, beginning at 2:02 p.m.
35 and ending at 9:39 p.m., on Wednesday, October 23,

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1 APPEARANCES:
2
3 For Plaintiffs in Colon v. NCAA, Case No.
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5
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40 (Mr. Berezney and Ms. Luedtke were not present at
41 the commencement of the deposition proceedings.)
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1 2024, before CATHERINE A. NOLASCO, Certified
2 Shorthand Reporter No. 8239.
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Page 3

1 APPEARANCES (Continued):
2
3 ALSO PRESENT:
4 CAMERON TUTTLE, Videographer, Veritext
5
6 CONFIDENTIAL DESIGNATIONS:
7 27:13-19
8 42:6-9
9 47:9-12
10 48:8-9
11 52:22-24
12 54:5-16
13 60:4-13
14 64:2-7
15 65:13-19
16 65:24-66:2
17 148:5-7
18 283:16-24
19 284:16-23
20 285:5-7
21 291:24-292:1
22 Exhibits 21 and 49
23
24
25

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<p>1 Could you please give me all the other 2 documents? Thank you. 3 BY MS. McCREADIE: 4 Q This -- this looks like another text chain 5 from your phone; is that correct? 6 A Yes. 7 Q Okay. And who are you sending this text 8 to? 9 A I don't quite recall the name. 10 Q Okay. I'm going to read the very 11 beginning of this text. It's from October 17, 2022, 12 and it says: "Hello there! I am happy to announce 13 that I will be posting my first hitting 14 Instructional Camp this Saturday, October 22nd and 15 Sunday, October 23rd at San Jose State University." 16 Did I read that correctly? 17 A Yes. 18 Q So you used the softball facilities at San 19 Jose State to host this camp, correct? 20 A Yes. 21 Q And who was the audience for this camp? 22 A There wasn't an audience. 23 Q Well, who were you hoping would attend 24 this camp? 25 A Clients.</p> <p style="text-align: right;">Page 134</p>	<p>1 volunteer coach at San Jose State, the work you did 2 through the camps you offered? 3 MR. GRALEWSKI: Vague and ambiguous. 4 Overbroad. 5 THE WITNESS: My camps were more 6 instructional, not the same. It was more for the 7 development of the clients. 8 BY MS. McCREADIE: 9 Q When you -- 10 A For a specific camp, it was just built so 11 that they had the opportunity at this time to go to 12 a camp if they weren't already practicing. 13 Q So when you say your camps were more 14 instructional, do you mean that they were more about 15 teaching -- 16 A They were more -- 17 Q -- younger people how to play softball? 18 A -- more one-on-one. So clients don't 19 necessarily have the opportunity, when they go to a 20 school camp, to have one-on-one instruction with a 21 Division I coach. So this allowed the opportunity 22 for them to receive the same coaching that the 23 coaches are instructing to their collegiate 24 athletes, but to get one-on-one instruction at a 25 personal situation like this camp.</p> <p style="text-align: right;">Page 136</p>
<p>1 Q And how did you advertise this camp? 2 A On my own through text messages, email. 3 Q How did you get the phone numbers and 4 emails to which you sent these ads? 5 A Previous clients from extensive amount of 6 lessons. 7 Q And was this also being advertised through 8 VIA the Zone? 9 A No. 10 Q So this was a camp you were offering 11 separately from your work at VIA the Zone? 12 A Yes. 13 Q Did you do any other advertising for this 14 camp besides the text messages and emails? 15 A No. 16 Q What did you teach during the camp? 17 A The camp was instructional, whether it was 18 starting with a dynamic warmup, drills, whether it 19 was throwing or hitting. It was a full-range camp 20 that involved mechanics, throwing mechanics, 21 defensive situations, and hitting as well. 22 Q How many hours a day was the camp? 23 A Roughly three hours. 24 Q So three hours per day? 25 Was this similar to your work as a</p> <p style="text-align: right;">Page 135</p>	<p>1 Q How many people would typically attend one 2 of these camps? How many students, that is to say? 3 A Sometimes it was zero, and it would range 4 maybe four. 5 Q So four would be the maximum usually? 6 A Yes. I never received more than that. 7 Q Okay. And the camp that you're 8 advertising in these particular text messages, that 9 was not the only camp you offered at San Jose State 10 while you were there, correct? 11 A Not -- not the only one. 12 MS. McCREADIE: Okay. I'm going to 13 introduce another exhibit, which will be Exhibit 43. 14 (Exhibit 43 was marked for 15 identification by the court reporter.) 16 MR. GRALEWSKI: Thank you. 17 BY MS. McCREADIE: 18 Q And this is TAYLOR_0000000246, and it's 19 marked -- marked "CONFIDENTIAL." 20 This appears to be another text chain from 21 your phone; is that correct? 22 A Yes. 23 Q And this one, if you look at the first 24 text, is from November 15, 2022, correct? 25 A Yes.</p> <p style="text-align: right;">Page 137</p>

<p>1 Q And it says: "Hello there! I am happy to 2 announce that I will be hosting my Northern 3 California instructional Hitting Camps on Sundays 4 for 2022 and 2023 At San Jose State University." 5 Did I read that correctly? 6 A Yes. 7 Q So did you end up hosting hitting camps or 8 other forms of camp -- of -- sorry. 9 So did you end up hosting softball camps 10 on Sundays in 2022 and 2023 at San Jose State? 11 A I can't recall how many, but it wasn't a 12 lot. 13 Q So at least on several additional Sundays 14 you hosted camps at San Jose State; would that be 15 fair to say? 16 A Hosted, but I would find out the amount 17 who were attending due to a Google sheet. So 18 sometimes on those Sundays there would be zero. 19 Q Okay. And on Sundays when there were 20 zero, I assume you did not go to the camp? 21 A Mm-hmm, yes. 22 Q Do you remember roughly how -- how many 23 camps you ended up hosting at San Jose State? 24 A I -- I don't remember. 25 Q Do you remember the time period in which</p> <p style="text-align: right;">Page 138</p>	<p>1 A No, she gave full -- full opportunity for 2 me to host these camps. 3 Q Did you charge students for these camps? 4 A Students of San Jose or clients? 5 Q The -- the client. The -- the people who 6 would be attending the camps. 7 A Yes. 8 Q How much per person did you charge? 9 A I don't remember. 10 Q Would it be roughly the same for what you 11 would have charged in your one-on-one instructions 12 via VIA the Zone? 13 A Roughly -- roughly the amount. 14 Q Okay. And were most of these camps, as we 15 discussed before, about three hours per day? 16 A Yes. Sometimes it would be less if it was 17 only a one-on-one. 18 Q It would be shorter if it was just one 19 person? 20 A Yeah, it would be shorter. 21 Q Are the amounts you made from these camps 22 reflected in your interrogatory responses about 23 compensation from softball-related positions? 24 A No. 25 Q Why not?</p> <p style="text-align: right;">Page 140</p>
<p>1 you hosted camps at San Jose State? 2 A During my coaching agreement from 2022 to 3 2023. 4 Q Did you have to get approval from folks 5 within San Jose State to use their facilities for 6 camps? 7 A Yes, I had to run it through compliance. 8 Q And what's "compliance," as you use it? 9 A It's the school division of where we have 10 to get things approved as a program, meaning 11 softball for San Jose, to use the facility. 12 Q What information did you have to provide 13 compliance about these camps? 14 A That there was a document that I would 15 have to input and state the facilities would need to 16 be used on specific days if -- so that the lights 17 were on, but there were some days where the camps 18 didn't happen, so the facilities would be used or 19 wouldn't be used. 20 Q Did -- did compliance ever deny permission 21 for you to have a camp at the San Jose State 22 facilities? 23 A It was always approved. 24 Q Did you have to clear these camps with 25 Coach Lohmann as well?</p> <p style="text-align: right;">Page 139</p>	<p>1 A Because there wasn't a lot of clients that 2 came to the camps. There was zero to one. 3 Q So you did not end up making a lot of 4 money from these camps; is that what you're saying? 5 A I -- I barely made anything. 6 Q Did you have to pay to use the San Jose 7 State facilities? 8 A No. 9 Q Could people who are not affiliated with 10 San Jose State use the facilities to host camps? 11 A I wouldn't know. 12 Q To your knowledge, would anyone hoping to 13 use the facilities have to go through compliance? 14 A I wouldn't know. 15 Q Have you held any camps or -- sorry. 16 Have you used the San Jose -- or -- yeah. 17 Have you used the San Jose State softball facilities 18 at all since you stopped being a volunteer coach for 19 them? 20 A No. 21 Q Have you ever had to pay for facilities to 22 host a camp or a training session? 23 A No. 24 Q Why did you want to use the San Jose State 25 facilities for these camps?</p> <p style="text-align: right;">Page 141</p>